BEFORE THE ARIZONA CORPORATION COMMISSION

Application of the North American)	
Numbering Plan Administrator, on)	
Behalf of the Arizona)	Docket No. T-00000A-21-0187
Telecommunications Industry, for)	
Relief of the 480 Numbering Plan Area)	

APPLICATION OF THE NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR ON BEHALF OF THE ARIZONA TELECOMMUNICATIONS INDUSTRY FOR RELIEF OF THE 480 NUMBERING PLAN AREA

The North American Numbering Plan Administrator ("NANPA"), as the neutral third-party Numbering Plan Area ("NPA") relief planner for Arizona and on behalf of the Arizona telecommunications industry ("Industry"), hereby requests that the Arizona Corporation Commission ("Commission") approve the Industry's consensus decision to recommend to the Commission an NPA boundary elimination overlay as the plan for relief of the 480 NPA. The recommended boundary elimination overlay removes the boundaries between the 480, 602 and 623 NPAs creating one NPA overlay area thereby reunifying the entire Phoenix rate center area and saving the assignment of two new NPAs.

¹The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 480, 602 and 623 NPAs.

²The Federal Communications Commission ("FCC") delegated authority to the states to review and approve NPA relief plans. *See* 47C.F.R.§52.19.

³ Consensus as used in this document means: Consensus is established when substantial agreement has been reached among those participating in the issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement. (ATIS Operating Procedures, Section 7.1, Version 5.5, August 23,2018) *See* Exhibit B, page 4.

The 480 NPA, including part of the City of Phoenix, is projected to exhaust its supply of Central Office Codes (often referred to as "CO" or "NXX" codes) by the first quarter of 2024 and is in need of relief. This means that absent NPA relief, the supply of CO Codes in the 480 NPA is projected to run out during the projected exhaust quarter. In accordance with Industry guidelines, only an overlay will meet the requirements for relief for the 480 NPA because it is scheduled to transition to mandatory 10-digit local dialing due to the national implementation of the 988 abbreviated code to reach the National Suicide Prevention Lifeline.4 The 602 and 623 NPAs are not included in the transition to 10-digit local dialing as a result of the 988 project. The Industry recommends the implementation of a boundary elimination overlay which would return the City of Phoenix to one rate center by removing the current boundaries between the 480, 602 and 623 NPAs and combining the geographic areas of the NPAs into one overlay area. The Industry will implement the boundary elimination overlay pursuant to a 13-month implementation schedule which will begin after mandatory 10-digit local dialing has been implemented in the 480 NPA.5 Adhering to the Industry agreed-upon implementation schedule will allow the boundary elimination overlay to be implemented six-months prior to the projected exhaust of the 480 NPA, while allowing the Industry to complete the 10-digit local dialing implementation for the 988 project first.

⁴ See NANPA Planning Letter 556 published on the NANPA website at https://www.nationalnanpa.com/pdf/PL_556.pdf.

⁵The implementation plan for implementation of the 988 abbreviated dialing code for the National Suicide Prevention Lifeline educates customers to expect that mandatory 10-digit dialing will begin on October 24, 2021. Service providers will then have between October 24, 2021 and July 15, 2022 to remove 7-digit dialing in the 480 NPA from their networks. See the 988 milestones posted on the NANPA website at

https://www.nationalnanpa.com/transition to 10 digit dialing for 988/index.html.

The Industry respectfully requests that the Commission expeditiously approve the Industry's plan to implement the boundary elimination overlay plan as set forth herein.

Background: The Phoenix rate center was split in 1999 from the 602 NPA into three NPAs creating the 480 and 623 NPAs. The 480 NPA serves the southeastern area of Arizona including but not limited to the state capital of Phoenix, Chandler, Gilbert, Mesa, Tempe, Scottsdale, and Sun Lakes in the counties of Maricopa and Pinal. The 480 NPA is bordered on the north by the 623 and 928 NPAs, to the east by the 520 and 928 NPAs, to the south by the 520 NPA and to the west by the 602, 623 and 928 NPAs.

As required by the FCC, NANPA collects area code and CO code assignments and utilization data, develops projected demand for numbering resources and publishes the projected exhaust of each area code twice a year. In April 2021, NANPA published its semi-annual Numbering Resource Utilization/Forecast (NRUF) and NPA Exhaust Analysis ("April 2021 NRUF Report") which indicated that the 480 NPA will exhaust during the first quarter of 2024.6 Because the 480 NPA is within 36-months of projected exhaust, NANPA convened an Industry relief meeting via web conference on April 28, 2021.8

⁶ April 2021 NRUF and NPA Exhaust Analysis ("April 2021 NRUF Report"). The April 2021 Report can be accessed on the NANPA website at https://www.nationalnanpa.com/.

⁷To plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning and Notification Guidelines (ATIS-0300061, 2021-04 ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, Industry, and regulatory authorities within a particular geographic NPA in the planning an execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS website located at

https://access.atis.org/apps/group_public/documents.php?view= . NANPA is responsible for initiating area code relief in sufficient time to prevent the exhaust of numbering resources before relief is implemented, typically 36-months prior to exhaust. NPA Relief Planning Guidelines at §5.0.

⁸A copy of the April 28, 2021 meeting minutes is attached as Exhibit A. Exhibit A also includes the Industry's proposed customer education plan and technical milestones.

Prior to the meeting, NANPA distributed an Initial Planning Document ("IPD") to the Industry. The IPD contained descriptions, maps, general facts and assumptions, and the projected life of two area code relief alternatives. The first, referred to as Alternative #1 in the IPD, is an all-services distributed overlay with a projected life of 35 years. An all-services overlay is a form of NPA relief wherein a new NPA is assigned to the same geographic area occupied by the exhausting NPA. Alternative #2 in the IPD is a boundary elimination overlay of the 480, 602 and 623 NPAs with a projected life of 26 years. A boundary elimination overlay is a form of NPA relief in which the boundary between existing non-exhausting NPAs and the exhausting NPA is eliminated such that all of the NPA codes serve the same geographic area, forming an overlay over each other. CO codes from the non-exhausting NPAs would be assignable in the exhausting NPA, and any remaining CO codes from the exhausting NPA would be assignable in the non- exhausting NPAs after the overlay is implemented. In both the all-services overlay and the boundary elimination overlays, ten-digit dialing would be required within and between the affected area codes.

The meeting attendees discussed the relief alternatives and reached consensus to recommend Alternative #2, the boundary elimination overlay, to the Commission as the method of relief for the 480 NPA.¹⁰ The Industry preferred the boundary elimination overlay because it makes Phoenix one rate center again, will make dialing 10-digits for local calls consistent throughout the state,¹¹ does not have a significant difference in projected life from the all-services overlay for just the 480 NPA, is a more efficient use

⁹ A copy of the Initial Planning Document ("IPD") is attached as Exhibit B.

¹⁰ See Exhibit A.

¹¹The 520 and 928 NPAs are also scheduled to transition to 10-digit dialing due to the 988 project.

of existing numbering resources, and saves the assignment of two new NPA codes, one new NPA code for the 480 and another for the relief of the 602 NPA which is projected to exhaust in second quarter 2026.

Description of the Recommended Overlay Option: In Alternative #2, the boundaries between the existing 480, 602 and 623 NPA codes would be eliminated and the 480, 602 and 623 NPAs would be assigned to the same geographic areas occupied by the existing and recognizable three NPAs, 480, 602 and 623. The customers in those NPAs would retain their current telephone numbers. However, consistent with FCC regulations, 10-digit-dialing for all calls by all customers within and between the 480, 602 and 623 NPAs would be required. 12 While implementation of the overlay requires mandatory 10-digit dialing for local calls, the 480 NPA will transition to 10-digit local dialing along with the 520 and 928 NPAs, because of the implementation of the 988 abbreviated code for the National Suicide Prevention Lifeline. This would leave the 602 and 623 NPAs as the only NPAs in Arizona without mandatory 10-digit dialing for local calls. In addition, because the current projected exhaust date for the 602 NPA requires relief planning to begin a mere two years after the exhaust of the 480 and an overlay would be the only option for relief of the one-rate center 602 NPA,13 the 623 NPA would remain as the only NPA without 10-digit local dialing in the state.

The boundary elimination overlay will bring the Phoenix rate center back together so that CO Codes in the 480, 602 and 623 NPAs will be assigned upon request in the any part of the Phoenix rate center upon the effective date of the boundary elimination overlay. Currently, the 602 NPA, which consists of one rate center, Phoenix, is projected

¹² 47 C.F.R. § 52.19(c)(3)(ii).

¹³ NPA Relief Planning Guidelines at §5.6.2.

to exhaust in second quarter 2026. The 623 NPA, which also consists of one rate center, Phoenix, is forecasted to exhaust in the fourth quarter 2069. Eliminating the boundaries between the 480, 602 and 623 NPAs would result in the three-NPA overlay complex with a projected life of 26 years.

The Industry recommends that local calls within and between NPAs be dialed using 10 digits, toll calls within and between NPAs be dialed using 1+10 digits, and operator assisted calls be dialed using 0+10 digits. The recommended dialing plan is set forth in the following table and is consistent with the dialing plan that will be implemented in the 480, 520 and 928 NPAs due to the 988 project:

Dialing Plan for the All-Services Overlay

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or	10 digits (NPA-NXX-XXXX) *
	Foreign NPA (FNPA)	
	(including Extended	
	Area Service (EAS)	
	calls)	
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services	HNPA or FNPA	o+10 digits (o+NPA-NXX-XXXX)
Credit card, collect, third party		

^{*1+10} digit permissible at each service provider's discretion

Industry participants reached consensus to recommend to the Commission a 13-month schedule for implementing the boundary elimination overlay. The recommended schedule, provided below, includes time intervals for each implementation phase but does not include specific dates. The Industry respectfully requests that the Commission allow the Industry to select the specific implementation dates after a Commission order is issued that do not interfere with certain dates such as holidays, high traffic days, network freeze periods, or dates that conflict with other overlay implementations occurring across the country. Moreover, an expeditious approval of the instant Application and adhering to the proposed implementation

schedule will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes. The Industry-agreed upon implementation schedule is set forth in the table below. It should be noted that there is a permissive 10-digit local dialing period of six months for the 602 and 623 NPAs to permit customers in those NPAs to become accustomed to the change in dialing pattern.

Implementation Schedule for the Boundary Elimination Overlay

EVENT	TIMEFRAME
Customer Education and Network Preparation	6 months
Period Begins	
Permissive 10-digit Dialing and Customer Education Period (<i>Calls within existing 602 and 623 NPAs can be dialed using 7 or 10-digits</i> ¹³) Mandatory 10-digit dialing begins at the end of the Permissive Dialing Period.	6 months
Effective Date of the New 480/602/623 NPA Boundary Elimination Overlay; Earliest date that 480, 602 or 623 NPA central office codes can become effective anywhere throughout the combined 480/602/623 NPA overlay area.	1 month (After Mandatory Dialing Begins)
Total Implementation Interval	13 months

Conclusion: The Industry requests that the Application be granted expeditiously. To the extent there is opposition, the Industry requests that the Commission forego in-person meetings and hearings in favor of written comments and

¹³ The 480 NPA will already have 10-digit local dialing as a result of the 988 project.

reply comments. Once the Commission has granted this Application, the Industry will implement a boundary elimination overlay over the 480, 602 and 623 NPA areas in accordance with the implementation schedule set forth above. As such, the Industry respectfully requests that the Commission expeditiously approve the Industry's plan to implement the boundary elimination overlay plan no later than January 14, 2022, unless there is a change in the exhaust projection that brings in the exhaust date sooner.

Respectfully submitted,

Kimberly Willer
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June 8, 2021

EXHIBIT A



May 25, 2021

To: All 480, 602, 623 NPA Code Holders and Interested Industry Members (Arizona)

Subject: Final Minutes of the Initial Relief Planning Meeting for the 480 NPA

Attached are the final minutes from the April 28, 2021, Arizona 480 NPA Initial Relief Planning meeting. These meeting minutes became final on May 19, 2021, and include edits received by the Industry.

If you have any questions, please give me a call at (571) 363-3824 or via email at hwayman@nanpa.com.

Sincerely,

Heidi A. Wayman Manager, Data Management NANPA

CC: Matt Connolly – ACC
Pamela Genung – ACC
Barbara Keene – ACC
Maureen Scott – ACC
Ranelle Paladino - ACC

ARIZONA 480 NPA INITIAL RELIEF PLANNING MEETING VIA WEB CONFERENCE FINAL MINUTES April 28, 2021

WELCOME, INTRODUCTIONS & AGENDA REVIEW

Heidi Wayman, Manager, Data Management–NANPA, welcomed the participants and reviewed the objective of the meeting. A list of attendees can be found in Attachment #1. Heidi then reviewed the agenda and NANPA's role and responsibilities.

NANPA'S ROLE AND RESPONSIBILITIES

Heidi reviewed NANPA's role and responsibilities for today's meeting as follows:

- NANPA starts the relief planning process 36 months prior to exhaust of the Numbering Plan Area (NPA). In this case, the October 2020 projected exhaust for the 480 NPA was first quarter of 2024 (1Q2024).
- Distribute the relief planning meeting notice at least four weeks prior to the initial relief planning meeting which was completed on March 30, 2021.
- Then, the main objective is achieved by reaching consensus on the relief alternative
 to be included in the petition for relief to be filed with the Arizona Corporation
 Commission (ACC).
- Additional items to be included in the filing with the ACC could be the dialing plan, implementation intervals and compliance with any state specific requirements.
- Customer and technical milestones will also be discussed for inclusion in the meeting minutes which will be attached as an exhibit to the petition filed with the ACC.
- Then NANPA is charged with the responsibility of filing a relief petition, on behalf
 of the industry, with the regulatory authority. Once the industry comes to consensus
 on what should be included in the filing, NANPA will file the legal document within
 six weeks of this meeting per the INC guidelines or as decided by the industry or as
 required by the state statute.

REVIEW CONSENSUS PROCESS AND NPA RELIEF PLANNING GUIDELINES

Heidi stated that the ATIS (Alliance for Telecommunications Industry Solutions) approved industry consensus process would be followed. She reviewed the consensus process and explained how consensus is determined. In addition, she stated that the minutes would be comprised of consensus agreements, and that issues not captured by consensus could be expressed in the form of a Statement for the Record, which could be conveyed at any point during the meeting.

An overlay is the only option for relief of the 480 NPA, per Section 5.6.3 of the Industry Numbering Committee's NPA Code Relief Planning and Notifications Guidelines (ATIS-0300061; "the Guidelines") which states:

Where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit dialing or has already transitioned to 10-digit dialing, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

Background information on the 988 project was presented from Planning Letter 556 (PL-556) which is available on the NANPA website. The aforementioned Guidelines were updated in response to the adoption of FCC Order 20-100 approving the designation of 988 as the 3-digit abbreviated dialing code for the National Suicide Prevention Lifeline. PL-556 states:

On July 16, 2020, the FCC adopted an Order (FCC 20-100) approving the designation of 988 as the 3-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline, requiring all telecommunications carriers, interconnected Voice over Internet Protocol (VoIP) providers, and oneway VoIP providers (covered providers) to make any network changes necessary to ensure that users can dial 988 to reach the existing National Suicide Prevention Lifeline: 1-800-273-8255 / 1-800-273 (TALK) by July 16, 2022. The Order requires covered providers to implement mandatory 10-digit dialing in NPAs that use both 7-digit dialing and 988 as an NXX.

The 480 NPA is one of the NPAs transitioning to 10-digit dialing to ensure users can dial 988 and reach the National Suicide Prevention Lifeline.

Heidi also reviewed the implementation schedule to transition to 10-digit dialing as outlined in PL-556.

ACTION	TIME	DATE
Start of permissive 10-digit dialing ("permissive 10-digit dialing effective date")	12:01 am local time	April 24, 2021 (This is the date communicated to customers as the "permissive dialing date" and starts the 6-month period where customers start practicing dialing 10 digits and reprogram CPE as needed; this is typically a 6-month period in an overlay implementation)
End of permissive dialing and start of mandatory 10- digit dialing ("mandatory 10-digit dialing effective date")	12:01 am local time	October 24, 2021 (This is the date communicated to customers as the "mandatory dialing date"

		and starts the 8.5-month period where carriers can start enforcing mandatory 10- digit dialing through their carrier-specific rolling cut schedule. This is not a flash cut.)
End of mandatory 10-digit enforcement implementation	12:01 am local time	July 15, 2022 (This is the deadline by which carriers must have completed their rolling cuts to enforce mandatory 10-digit dialing)

Heidi referred the participants to the relief planning meeting aids included in the relief plan meeting notice: Excerpts from the INC NPA Code Relief Planning Guidelines, and the Customer and Technical Milestones. These meeting aids will assist the participants in their decision making and the Guidelines can be downloaded from the ATIS web site at: (www.atis.org).

REVIEW RELIEF PLAN FOR THE 480 NPA

Heidi reviewed the relief plan meeting notice.

RELIEF PLANNING BACKGROUND AND ASSUMPTIONS:

The 480 NPA was introduced in 1999 when it was part of a double split from the 602 NPA creating both the 480 and 623 NPAs which split the Phoenix rate center among all three NPAs.

The 480 has only one rate center: Phoenix. It serves counties of Maricopa and Pinal. The 480 serves cities including but not limited to Chandler, Gilbert, Mesa, Phoenix (the state capital), Tempe, Scottsdale and Sun Lakes. The 480 is bordered on the north by the 623 and 928 NPAs, to the east by the 520 and 928 NPAs, to the south by the 520 NPA and to the west the by the 602, 623 and 928 NPAs.

NPA STATUS

Exhaust Forecast: The April 2021 Number Resource Utilization Forecast ("NRUF") and NPA Exhaust Analysis projects the exhaust of the 480 NPA during the first quarter of 2024 (1Q2024). The 602 NPA is forecast to exhaust in the second quarter of 2026 (2Q2026) and the 623 NPA is projected to exhaust in the fourth quarter of 2069 (4Q2069).

As of April 27, 2021, the 480 NPA has 718 codes assigned, 60 codes available for assignment, and 22 Un-Assignable codes. There are 42 total service providers: 40 CO code holders and 2 OCNs that only have thousands-blocks.

The 602 NPA has 703 codes assigned, 74 codes available for assignment, and 23 Un-Assignable codes There are 39 total service providers.

The 623 NPA has 278 codes assigned, 499 codes available for assignment, and 23 Un-Assignable codes There are 32 total service providers: 27 CO code holders and 5 OCNs that only have thousands-blocks. (See Attachment #2)

NUMBER POOLING INFORMATION

Cecilia McCabe, NANPA – NPA Relief Planner, reported that in the 480 NPA, pooling commenced on March 14, 2002, and pooling is mandatory in the one rate center, Phoenix. In the period of April 1, 2020 to April 27, 2021, 283 blocks have been assigned in the 480 NPA, and as of April 27, 2021, there is 1 block available for assignment to service providers. Pooling has assigned 26 codes in the same period, 23 for pool replenishment, 0 for dedicated customers and 3 for LRNs. The forecasted need for the next twelve months is 7 codes for pool replenishment and dedicated customers.

In the 602 NPA pooling commenced on February 14, 2002, and pooling is mandatory in the one rate center, Phoenix. In the period of April 1, 2020 to April 27, 2021, 216 blocks have been assigned in the 602 NPA, and as of April 27, 2021, there is 1 block available for assignment to service providers. Pooling has assigned 21 codes in the same period, all 21 for pool replenishment. The forecasted need for the next twelve months is 7 codes for pool replenishment and dedicated customers.

In the 623 NPA pooling commenced on December 18, 2002, and pooling is mandatory in the one rate center, Phoenix. In the period of April 1, 2020 to April 27, 2021, 147 blocks have been assigned in the 623 NPA, and as of April 27, 2021, there are 10 blocks available for assignment to service providers. Pooling has assigned 16 codes in the same period, 15 for pool replenishment, 0 for dedicated customers and 1 for an LRN. The forecasted need for the next twelve months is 16 codes for pool replenishment and dedicated customers. (See Attachment #3)

Heidi also reviewed:

- Map of all Arizona NPAs
- NPA 480 Rate Center Map
- NPA 602 Rate Center Map
- NPA 623 Rate Center Map
- Rate Center Table for 480, 602, and 623 NPAs
- 480 NPA Code Holder Table
- 602 NPA Code Holder Table
- 623 NPA Code Holder Table

PROPOSED RELIEF ALTERNATIVES

ALTERNATIVE #1 - ALL SERVICES DISTRIBUTED OVERLAY

A new NPA code would be assigned to the same geographic area occupied by the existing 480 NPA. Customers would retain their current telephone numbers; ten-digit local dialing by all customers within and between NPAs in the affected area is required when an overlay is implemented, and is required per FCC 20-100 in the 480 NPA regardless. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 480 NPA, all future code assignments will be made in the overlay area code. The projected life would be:

Total CO Codes = 737 Total Rate Centers = 1 Area Code Life in Years = 35 years

ALTERNATIVE #2 - NPA BOUNDARY ELIMINATION OVERLAY

The boundary between the existing 480, 602 and 623 NPA codes would be eliminated and the 480, 602 and 623 NPAs would be assigned to the same geographic areas occupied by the existing 480, 602 and 623 NPAs. The 480 NPA, 602 NPA and 623 NPA customers would retain their current telephone numbers; however, ten-digit dialing for all calls by all customers within and between the 480, 602 and 623 NPAs affected area would be required (ten-digit dialing is required per FCC 20-100 in the 480 NPA regardless). Available central office codes in the 602 and 623 NPAs will be assigned upon request in the 480 area with the effective date of the new area code boundary and available 480 NPA central office codes could be assigned upon request in the 602 and 623 NPA area. All future NXX code assignments will be made from the existing code supply of central office codes in the 480, 602 and 623 NPAs. The 602 NPA has one rate center (PHOENIX), and the projected exhaust is **2Q2026**. The 623 NPA has one rate center (PHOENIX), and the projected exhaust is **4Q2069**. Eliminating the boundary between the 480, 602 and the 623 NPAs would have a combined life of 26 years and would save the assignment of two new NPAs.

480 NPA	602 NPA	623 NPA
Total CO Codes = 737	Total CO Codes = 724	Total CO Codes = 299
Total Rate Centers = 1	Total Rate Centers = 1	Total Rate Centers = 1

Combined Area Code Life in Years = 26 years

GEOGRAPHIC SPLIT ALTERNATIVE

Per Section 5.6.3 of the NPA Code Relief Planning & Notification Guidelines (ATIS- 0300061) an overlay is the only relief option of the 480 NPA.

¹ One NPA code is saved by not having to add a new area code for the relief of the 480 NPA and the second NPA is saved by not having to add a new area code for the future relief needed for the 602 NPA which would begin relief planning in two years.

Where NPA relief is required for a single NPA area that is scheduled to transition to 10-digit dialing or has already transitioned to 10-digit dialing, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

CONSENSUS ON RELIEF ALTERNATIVE

There was discussion on the relief alternative to be recommended to the ACC and the industry went through a list of pros and cons of the relief alternatives. A proposal was made, and consensus was reached among the industry members to recommend Alternative #2, the Boundary Elimination Overlay. The boundary elimination overlay will be included as the industry's choice of relief in the petition filed with the ACC. The boundary elimination overlay was the industry's recommended form of relief due to the pros listed:

Boundary Elimination Overlay Pros and Cons:

Pros:

- 1 Eliminates the need to open a new NPA for the 480 NPA and opening an additional NPA for the 602 NPA which would begin relief planning in 2 years.
- 2 Does not require customers to change their area code.
- 3 It makes the 3-way split of the Phoenix rate center one rate center again.
- 4 Creates a consistent 10-digit dialing plan across the entire state of Arizona. The boundary elimination will require 10- digit dialing for 602 and 623 NPAs. The FCC requirement for 10-digit dialing for the 988 3-digit code requires the 480, 520 and 928 NPAs to transition to 10-digit dialing.
- 5 It is a more efficient use of resources.
- 6 Allows the industry to address relief of the 602 NPA since relief planning will need to begin in two years.

Boundary Elimination Overlay Pros and Cons:

Cons:

- 1 Boundary elimination alternatives generally have a shorter projected life than the all-services overlay because no new NPA is added. However, in this case, it is only a difference of nine (9) years.
- 2 Impacts a larger quantity of customers than the all-services overlay over only 480 NPA.
- 3 Requires customers in the 602 and 623 NPAs to dial 10-digits where otherwise, based on current exhaust projections, they wouldn't be subjected to NPA Relief and potentially 10-digit dialing, for another 5 years for the 602 NPA and 48 years for the 623 NPA.

CONSENSUS ON DIALING PLAN AND IMPLEMENTATION INTERVALS

A recommendation was made, and consensus was reached to include the following dialing plan as the dialing plan that will be applied to all three NPAs: 480, 602 and 623 with the

implementation of the boundary elimination overlay. This dialing plan maintains a consistent dialing plan throughout the state of Arizona.

TYPE OF CALL	CALL TERMINATING IN	DIALING PLAN
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA) (including Extended Area Service (EAS) calls)	10-digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

^{*1+10} digit permissible at each service provider's discretion. (Industry Best Practice)

A recommendation was made, and consensus was reached to include a 13-month implementation interval for the boundary elimination overlay of the 480, 602 and 623 NPAs.

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period (Calls within existing 602 and 623 NPAs can be dialed using 7 or 10 digits) Mandatory 10-Digit dialing begins at the end of the Permissive Dialing Period	6 months
Effective Date of the New 480/602/623 NPA Overlay; Earliest date that 480, 602 or 623 NPA central office codes can become effective anywhere throughout the combined 480/602/623 NPA overlay area	1 month after Mandatory Dialing begins
Total Implementation Interval	13 months

CUSTOMER EDUCATION PLAN

There was discussion regarding including additional items in the minutes and consensus was reached to include the following customer and technical milestones for implementation of a boundary elimination overlay.

Customer Milestones:

		Responsibility
1	Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Carriers
2	Issue initial press release	State Commission and All Carriers(optional to carriers)
3	Send Special letters to PSAPs and Directory Publishers	Industry committee co-chairs

4	Update social media with information regarding boundary elimination overlay	All Carriers(optional)
5	Update websites with information regarding boundary elimination overlay	All Carriers
6	Develop language for use in Directories to alert the consumers of 10-digit dialing and the new area Code overlay boundaries.	Directory Publishers
	After Permissive 7 and 10-Digit Dialing Begins	All Carriers
7	Issue second customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	All Carriers
8	Send Special letters to Alarm and Safety, Directory, Pay Telephone & PSAPs.	Co-chairs
9	Update social media with information regarding boundary elimination overlay	All Carriers (optional)
10	Update websites with information regarding boundary elimination overlay	All Carriers
11	Issue second (Mandatory) press release	State Commission and All Carriers (optional to carriers)

Technical Milestones:

		Responsibility
1	LERG updates in BIRRDS or via AOCN. (i.e., routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc.	All Carriers
2	Ensure Highway boxes are programmed with 10-digit dialing.	Co-chairs
3	Network ready for Permissive Dialing	All Carriers
	Create Permissive Dialing Industry Contact List	Co-Chairs
4	Permissive Dialing Begins	All Carriers
5	Establish NPA Specific type of Trunks	All Carriers

6 Completion of 10-digit signaling transition between carriers' networks	All Carriers
7 Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed.	FE TO SECURE A SECURITY OF THE
8 Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	All Carriers
9 Recorded announcements in Place and Tested	All Carriers
E911 Work Plan	
10 Confirm new ESN/NPD has been established	Determine if required (Industry will determine if this milestone will be required.)
11 Ensure SRDB table has NPAs built in	Determine if required (Industry will determine if this milestone will be required.)
12 Notify PSAPs, PSALI customers and County Coordinators (1 st and 2 nd Notification)	911 Providers
13 Review and Submit CLEC Trunk Order Requests to local provider if needed	All Carriers
14 Update PSAP equipment	PSAPs
Service II Productive Company of the	911 Providers and Carriers
15 Trunk Orders Complete	
16 Build E911 Network/Tandem Translations	911 Providers

The above are the typical milestones necessary for implementation of a boundary elimination overlay; however, these may need to be modified during the actual implementation.

STATEMENT FOR THE RECORD

There were no statements for the record.

NANPA FILING INDUSTRY EFFORTS WITH COMMISSION

Consensus was reached that NANPA will file the application for relief with the Arizona Corporation Commission informing them of the outcome of this relief planning meeting. The INC guidelines require the application to be filed with the regulator within 6-weeks (June 9, 2021) of the initial relief planning meeting unless otherwise decided by the

industry.

REVIEW OF DRAFT MEETING MINUTES

Heidi reviewed the following timeline outlining items to be completed.

AZ 480 NPA Relief Planning Meeting & Draft Petition Schedule

April 28 – Initial Relief Planning Meeting

May 12 - Draft meeting minutes posted

May 19 - Draft petition sent via NNS to industry participants

May 26 – Meeting to review draft petition

June 9 - Petition filed with ACC

Consensus was reached that the draft minutes resulting from this meeting will be distributed to the industry no later than May 12, 2021. Any changes or corrections are to be submitted to Heidi via hwayman@nanpa.com by May 19, 2021 when the minutes will become final.

Adjourned

###

These minutes became final on May 19, 2021, including edits received from the Industry.

ARIZONA 480 NPA Initial Relief Planning Meeting via Web Conference Meeting Attendees April 28, 2021

NAME	COMPANY			
Jeanne Bell	Allstream			
Deborah Anstead	Altice USA			
Matt Connolly	Arizona Corporation Commissio			
Pamela Genung	Arizona Corporation Commissio			
Barbara Keene	Arizona Corporation Commissio			
Ranelle Paladino	Arizona Corporation Commissio			
Sharon Poer	AT&T			
Jeffrey Herman	Boost Mobile			
Sandra Jones	Cox Communications			
Paul Belote	Inteliquent			
Cecilia McCabe	NANPA			
Heidi Wayman	NANPA			
Linda Hymans	NANPA			
Karen Riepenkroger	T-Mobile			
Shaunna Forshee	T-Mobile			
Esperanza Creighton	T-Mobile			
Kyeva Babbitt	T-Mobile			
Steve Nicholls	Table Top Telephone			
Fernando de Moura	Telnyx			
Chanda Brown	Verizon			
Laura Dalton	Verizon			
Kelly Faul	Verizon/XO Communications			
Dana Crandall	Verizon Wireless			
Michael Ortega	Vonage			

Arizona Code Summary NXX Summary Data as of 4/27/2021

NPA	480	602	623		
Assigned NXXs	718	703	278		
Protected NXXs	0	0	0		
Reserved NXXs	0	0	0		
Unavailable NXXs	22	23	23		i,
Available NXXs	60	74	499		
				Ī	6
Total	800	800	800		
7 1 1 1 W	9		V		
Code Assignment History	10	10	-	-	
2016	17	12	8		
2017	16	6	5		
2018	19	10	6	-	
2019	21	13	7		
2020	27	18	17		
2021	7*	8*	4*		
Based on April 2021 NRUF		3	2		
480 NPA projected exhaust 1Q2024				1	
602 NPA projected exhaust 2Q2026					
623 NPA projected exhaust 4Q2069			N		
*As of April 27, 2021		\$	25 14 25 15		
713 01 April 21, 2021					
Note: Unavailable indicates codes t					
codes include, but are not limited to				g., 958, 959	•
555, time), N11 and other unique co		and the same of th			į.
with special dialing arrangements (e.g., 7-dig	it dialing a	icross		
NPA boundary).					

POOLING STATISTICS Provided By: Cecilia McCabe			
ST/NPA:	AZ 480	AZ 602	AZ 623
MEETING DATE:	4/28/21		
POOL START DATE (PSD)	3/14/02	2/14/02	12/18/02
RATE CENTERS			
# Total	1	1	1
# Mandatory	1	1	1
# Mandatory-Single Service Providers (M*)	0	0	0
# Optional	0	0	0
# Excluded	0	0	0
BLOCKS ASSIGNED			
# Total	283	216	147
(For time period 4/01/20 - 4/27/21)			
BLOCKS AVAILABLE			
#Total	1	1	10
(As of preparation date: 4/27/21)			
CODES ASSIGNED	21		T-2
# Total	26	21	16
# for Pool Replenishment	23	21	15
# for Dedicated Customers	0	0	0
# for LRNs	3	0	1
(For time period 4/01/20 - 4/27/21)			
CODES FORECASTED			7
# Total	7	6	16
# for Pool Replenishment and Dedicated Customers	7	6	16
# for LRNs	0	0	0
(For the next twelve months as of: 4/27/21)			

EXHIBIT B



March 30, 2021

To: All 480, 602 and 623 NPA Code Holders and Interested Industry Members (Arizona)

Subject: Arizona 480 NPA Initial Planning Document

The North American Numbering Plan Administrator (NANPA) is responsible for initiating area code relief (in accordance with the NPA Code Relief Planning and Notification Guidelines, ATIS-0300061) in areas within the United States in sufficient time to prevent exhaust of numbering resources before relief is implemented, typically thirty-six months prior to exhaust. As of October 2020, the 480 NPA in Arizona is projected to exhaust during the first quarter of 2024, and relief planning is to begin in the first quarter of 2021.

The NPA Code Relief Planning and Notification Guidelines state if a single NPA is scheduled or has already transitioned to 10-digit dialing, an overlay is the only option and the Initial Planning Document (IPD) is not required. However, NANPA has determined more than one overlay alternative is a viable relief option for the 480 NPA.

Accordingly, on April 28, 2021, NANPA will convene an industry NPA relief planning meeting to develop a recommended relief plan for the 480 NPA. The objective of this meeting is to secure consensus among members of the Arizona Telecommunications Industry on a single plan of relief for the 480 NPA. The resulting relief plan will be filed with the Arizona Corporation Commission for their consideration. The Industry recognized consensus process developed by the Alliance for Telecommunications Industry Solutions (ATIS) will be applied in the decision-making efforts.

Also attached to this notice is the meeting agenda, consensus process, the Arizona 480 NPA NXX Summary and Pooling Statistics reports, relief planning meeting aids, Service Provider CO Code assignments by OCN, customer and technical milestones and associated maps. Due to the fact there are relief alternatives outlined that include NPAs 602 and 623, the Pooling Statistics and NXX Summaries are included for these additional NPAs.

Because the impacts of NPA relief are so significant, NANPA strongly encourages your participation on April 28, 2021. Past experience demonstrates that this could be the only meeting of the industry before a decision is reached on a recommended relief plan that will be submitted to the Arizona Corporation Commission for approval. The details of the relief planning meeting conference call are as follows:

Date: Wednesday, April 28, 2021

Time: 10 am PT; 11 am MT; 12 pm CT; 1 pm ET

Join Zoom Meeting

https://somos.zoom.us/j/98517197021?pwd=M1dvQzlOcFJtajU5cGdKRHViYTd3UT09&from=addon

Meeting ID: 985 1719 7021

Password: 480503

One tap mobile 8884754499,,98517197021# US Toll-free 8778535257,,98517197021# US Toll-free

Dial by your location 888 475 4499 US Toll-free 877 853 5257 US Toll-free 855 703 8985 Canada Toll-free Meeting ID: 985 1719 7021

Please feel free to distribute this notice to others in the industry that you feel should attend this important NPA relief planning meeting. If you receive this notice from someone else and would like to receive additional information in the future about the 480 NPA, you are encouraged to sign up to NANPA's NANP Administration System (NAS) NANP Notification System (NNS) by going to www.nanpa.com, then selecting NAS Login and then selecting New Registration and following the sign-up process.

If you have any questions, please give me a call at (571) 363-3824 or via email at hwayman@somos.com.

Sincerely,

Heidi A. Wayman Manager, Data Management NANPA

ce: Matt Connolly - ACC Staff

ARIZONA 480 NPA INITIAL RELIEF PLANNING MEETING VIA WEB MEETING

April 28, 2021 10 AM PT, 11 AM MT, 12 PM CT, 1 PM ET

AGENDA

NANPA's Role and Responsibilities

Review of 480 NPA Background and History

Review 480, 602 and 623 NPA Status

Review Initial Planning Document and Proposed Alternatives

Consensus on Relief Alternative

Consensus on Implementation Intervals

Consensus on Customer Education & Technical Milestones

Consensus on Approval & Filing

Statements for the Record

Set Date to Approve Minutes

Open Discussions

Adjourn

INDUSTRY CONSENSUS PROCESS

AUGUST/23/2018 ATIS OPERATING PROCEDURES VERSION 5.5

7 RESOLUTION PROCESS

7.1 Consensus

Consensus is the method used by the ATIS Forums to reach resolution of Issues, unless specifically otherwise provided for in these Operating Procedures or in **Appendix A**. Consensus is established when substantial agreement has been reached among those participating in the Issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement.

Consensus requires that all views and objections be considered, and that a concerted effort be made toward their resolution. Observers shall have the opportunity to express their views and to influence the opinions of Voting Members. However, the opinions of Observers are not considered by the leadership in determining whether consensus has been achieved. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection. In other cases, the opinions of the minority should be recorded with the report of the substantial agreement, or consensus, of the majority.

When there are questions or disputes regarding consensus, leaders or participants should ask an objecting participant(s) to state the rationale for the objection and provide an opportunity for full discussion aimed at achieving full understanding and consideration of the objection.

A participant's silence is perceived as agreement by the Forum and its leadership. If participants do not agree, they should be encouraged to speak up and voice their opinion. A participant may appeal the resolution of an Issue in the manner provided for in Section 13.

1.0 Purpose

The purpose of this document is to provide guidelines for NPA code relief planning activities. This includes the relief planning process, industry notification process and NANPA's responsibilities to Affected Parties and applicable regulatory authorities within the North American Numbering Plan area. It also provides relief planning principles, administrative responsibilities and industry notification requirements. The steps of the NPA code relief planning process are listed and the alternative methods of providing relief and their various attributes are described.

2.0 Assumptions and Constraints

The development of these guidelines includes the following assumptions and constraints:

- 2.1 These guidelines were developed by the INC to apply to geographic NPA relief planning.
- 2.2 Section 14 has been added to incorporate NANPA's responsibility for Toll Free Service relief planning.
- 2.3 Relief activities will be undertaken to provide relief to an exhausting NPA. For the purpose of NPA relief planning, it is assumed that the capacity of an NPA is 792 CO codes (NXXs). However, in overlay NPA situations, the CO code exhaust capacity will be the number of NPA codes assigned to that geographic area times 792. It may not be possible to assign all 792 NXXs as CO codes for a variety of reasons.
- 2.4 The relief plan chosen will seek to minimize end user confusion while balancing multiple objectives including cost effectiveness, minimum customer impact, and long-lasting relief.
- 2.5 For each relief activity proposed in the plan, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years. However, the ultimate decision as to which geographic area is assigned a new NPA in an NPA split is usually in the hands of local regulatory authorities instead of the industry. In addition, an extended permissive dialing period for certain specific NXX codes, e.g., wireless or NXX codes containing numbers utilized by alarm companies, especially where local number portability (LNP) and/or thousands-block number pooling have been implemented, shall be avoided.
- 2.6 The ATIS consensus process will be employed in selecting an industry relief recommendation.
- 2.7 NANPA will moderate industry relief planning meetings and is required to do so in a fair and impartial manner, ensuring that all participants have any opportunity to express their opinions.
- 2.8 These relief planning guidelines were developed without making any assumption as to who will fill the role of CO Code Administrator or NANP Administrator.

- 2.9 CO codes and NPA codes are public resources and administrative assignment of these codes does not imply ownership of the resource by the entity performing the administrative function, nor does it imply ownership by the entity to which the resource is assigned.
- 2.10 The appropriate regulatory authority (e.g., state or country) has the ultimate authority to approve or reject a relief plan.
- 2.11 In the United States, geographic NPA code boundaries typically do not extend across state lines. Geographic NPA boundaries must follow rate center boundaries.
- 2.12 Once there is an approved relief plan, all code holders, block holders, and the Pooling Administrator (PA) in the exhausting NPA shall take the appropriate steps to facilitate the implementation of the plan.
- 2.13 These guidelines and all related documents and guidelines¹ referenced herein will be made available to all Affected Parties by the NANPA upon request.
- 2.14 Service Providers (SPs) and numbering resource administrators are responsible for managing numbering resources in accordance with these guidelines and the orders of applicable regulatory authorities. Both SPs and numbering resource administrators are subject to audits. Further information may be found in FCC 00-104 ¶62, FCC 00-429 ¶81-99, and 47 CFR §52.15(k).

3.0 NPA Relief Planning Principles

The following principles should be followed during NPA Code Relief Planning:

- 3.1 NANPA should facilitate the selection of an NPA code relief alternative based upon industry consensus and the NPA Code Relief Planning Process as outlined in Section 5 below.
- 3.2 NANPA should establish communication with all Affected Parties, industry members and appropriate regulatory bodies immediately after the need for NPA code relief has been determined.
- 3.3 Every SP should provide NANPA a contact for notification of NPA relief planning activities. These contacts shall maintain an active NANP Administration System (NAS) log-in and password to ensure notification of, and full participation in, any NPA relief planning activities in which they are assigned numbering resources in the affected NPA(s). A Service Provider Consultant (SPC) participating in an NPA relief planning activity on behalf of a particular SP shall identify the SP it is representing for the purposes of determining consensus.

4.0 CO Code Administrator's and Pooling Administrator's Responsibilities for Code Relief Planning

¹ ATIS-0300119, Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines (TBCOCAG); ATIS-0300046, Recommended Notification Procedures to Industry for Changes in Access Network Architecture.

- 4.6 Where necessary, NANPA presents the industry-consensus recommended NPA relief plan to appropriate regulatory authority(ies).
- 4.7 NANPA and the industry jointly identify dialing plan issues within local jurisdictions at the relief planning meeting.
- 4.8 NANPA provides assistance to users of numbering resources and suggests alternatives, when possible, that will optimize numbering resource utilization.
- 4.9 Prepares and issues information related to reports for special information requests and scheduled periodic reports that relate to utilization of numbering resources.

5.0 NPA Relief Planning Process

The NRUF and other available resources are used to identify projected NPA exhaust. NANPA shall prepare relief options for each NPA projected to exhaust within thirty-six months.

Considerations in the NPA Relief Planning Process include:

- a) The relief options shall cover a period of at least five years beyond the predicted date of exhaust, and shall cover more than one relief activity, if necessary, during the time frame.
- b) The relief plan may need to be changed over time to reflect changes that take place such as demand for NXX codes or other factors (e.g., local competition, LNP, implementation of number pooling, etc.) The semi-annual NRUF analysis shall be used as one of the tools in updating the options.
- c) Affected Parties are invited to provide input into development of the plan. The appropriate regulatory authority shall be made aware of the plan and approve the plan, if necessary.
- d) The choice of relief methods (e.g., split, overlay, boundary realignment) shall be specified in the plan, along with boundaries if a split is chosen. The options under consideration should include the choice of relief method, boundary information, the estimated relief period and other assumptions such as projected code assignment rates, etc. The lives of relief alternatives are based on the projected rate of assignment of codes as described in Section 5.1, and these alternatives' lives commence at the point in time of projected exhaust of the NPA. See Appendix D for a summary of the relief model.
- e) For each relief activity proposed in the plan, it is recommended that customers who undergo number changes shall not be required to change again for a period of 8-10 years.
- f) The use of protected codes (NXXs) is an assignment practice whereby a central office code assigned in one NPA is not available for assignment in an adjacent NPA in order to permit 7 digit dialing across the NPA boundary (where 10-digit dialing would otherwise be

required). The use of protected codes (NXXs), which permits 7-digit dialing across NPA boundaries, should be eliminated as part of the NPA code relief planning process unless the appropriate regulatory authority directs otherwise.²

g) The use of protected routes, which also permits 7-digit dialing across NPA boundaries, shall continue unless otherwise directed by the appropriate regulatory authority.³ Where it is suspected that protected routes and 7-digit dialing cross-boundary exists, NANPA shall continue the code assignment practices that permit the continued protection of these routes until such time as these routes are eliminated by the service provider(s) or the appropriate regulatory authority. Any changes in rate centers or NXXs that would increase or decrease protected routes shall be reported to NANPA by the service provider initiating the change. The notification shall include the tariff, the rate centers and NXX codes involved and the direction of the 7-digit local calling. This notification is important since such changes may have code consumption implications on multiple NPAs. It should be understood that continuing this practice can result in a less efficient use of resources and shorten the forecasted lives of the NPA currently under relief planning as well as the adjacent NPAs; i.e. two-way 7-digit dialing across NPAs might involve several rate centers and many NXX codes in multiple NPAs. Additionally, the relief planning model used by NANPA cannot take into account the protected routes when projecting the lives of new NPA relief alternatives because the model assumptions are based on the premise that all NXXs available for assignment can be assigned to all rate centers. A high number of protected routes may impact the availability of NXX codes in specific rate centers (usually high-demand rate centers), which directly impacts the exhaust timeframe of an area code. As a result, NPA relief planning may start prematurely or may not permit for the standard intervals for relief implementation.

In the long term, the plan shall result in the most effective use possible of all codes serving a given area. Ideally, all of the codes in a given area shall exhaust about the same time in the case of splits. In practice, this may not be possible, but severe imbalances, for example, a difference in NPA lifetimes of more than 10 years, shall be avoided.

5.1 Determine the Expected NPA Exhaust Period - Through the use of historical growth data as well as expected changes (e.g., pooling) to NXX demands in the future, NANPA should project to the best of its ability the expected quarter of exhaust of the NPA. Every practical source of data, including the NRUF survey results should be used as an aid in this projection. Projection results should be reported to the industry as soon as the NRUF or other analysis results are available. Once the earliest likely exhaust date is determined, NANPA should suggest a mandatory dialing date six months prior to the exhaust date if the recommended relief is an overlay. If the recommended relief is a geographic split, the end of the recorded announcement period should be at least six months prior to the earliest likely exhaust date.

² Per letter dated 10-29-97 from NANC Chairman to INC Moderator.

³ In the case of an NPA overlay, cross NPA boundary calls originating from the overlay must be dialed on a 10-digit basis.

- The NPA relief planning process shall begin immediately if NANPA finds it necessary to
 declare an NPA to be in Jeopardy before relief planning for that NPA has begun. NANPA
 will distribute the Initial Planning Document to the industry within four weeks of the
 declaration of jeopardy and will hold an industry NPA Relief Planning meeting no more
 than eight weeks after the Jeopardy announcement.
- It should be noted that an exhaust date based on a controlled allocation (rationing) is not reflective of the true need for relief.
- In cases where the NPA is in jeopardy and CO codes are rationed, two exhaust dates will be reported: (1) the exhaust date at jeopardy declaration, and (2) the exhaust date with controlled allocation.
- 5.2 Identify the Alternative Relief Methods Available Within the affected NPA, the NANPA should next identify possible NPA relief alternatives and methods from among those identified in Section 6.
- 5.3 Define the Attributes of Each Alternative or Method For each of the alternative relief methods identified in 5.2, NANPA should, with assistance from the industry participants, quantify impacts to subscribers, networks and service providers and industry concerns using Appendix B. Specific calculations such as the relative lengths of the relief periods, and local dialing plans using 7-digits or 10-digits should be made at this point. Examples of attributes are shown in Appendix E.
- Notify Industry of Pending NPA Exhaust and Results of Initial Relief Planning The next step in the NPA Relief Planning Process is to incorporate the results of the steps outlined in 5.1 through 5.3 into an Initial Planning Document (IPD) for distribution to the Industry in the affected NPA. The IPD should be attached to a notification to Industry members of future meeting schedules to be held for the purpose of discussing the alternative relief methods, with the objective of reaching consensus on the method to be adopted. The IPD should be provided at least four weeks prior to the first industry meeting to allow individual industry members to fully analyze the alternatives and identify impacts to their respective subscribers and networks. Industry members also should investigate any technical and operational impacts, such as required switch replacements and support system modifications.
- 5.5 Conduct Industry Meetings/Conference Calls with the Goal of Reaching Industry Consensus on a Relief Plan Meetings and/or conference calls should be held with all interested members of the industry within the affected NPA. Although most of these meetings are held via conference call, a face-to-face meeting may be scheduled if necessary. If a face-to-face meeting notice is issued, NANPA will state that an SP requesting a conference bridge must notify the meeting host to make arrangements (e.g., equipment, bridge number, cost of call). In order to keep the face-to-face meeting manageable, participants on the bridge shall not be accorded special consideration⁴. NANPA shall moderate these meetings or conference calls and be fully prepared

⁴ Caveat: those on the bridge may NOT ask for comments to be repeated or for additional explanations to be given because they cannot see what's happening in the room. The use of a bridge must not slow down the meeting.

- Meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.
- Notify Appropriate Regulatory Authority When consensus is reached within the industry or when NANPA determines additional meetings would not achieve consensus, NANPA should submit to the appropriate regulatory authority the results of the industry effort, if required. In its submission NANPA should also furnish all relevant background information including any statements for the record submitted in real time by industry participants (unless otherwise agreed), meeting minutes, mailing lists, etc. In the case where consensus could not be reached, brief position papers could be included.
- 5.6.1 Where NPA relief is required for an existing overlay complex, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required. NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including a timeframe for network preparation and customer education, with the new NPA effective at the end of the implementation schedule. There is no need for a permissive dialing period because local 10-digit dialing will already be in place. The draft petition shall include the state's existing overlay dialing plan.

NANPA shall notify all Affected Parties at least three (3) weeks in advance of a conference call scheduled to review and approve the draft petition. During the conference call, the timeframes for the implementation schedule will be determined. The recommended relief should be in place six months prior to the forecasted exhaust (see Section 7.2). As usual, meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

NANPA shall submit the petition to the appropriate regulatory agency requesting approval of the overlay, and after regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 - 5.12.

5.6.2 Where NPA relief is required for a single NPA area and NANPA has determined that only an overlay alternative will meet the guidelines, or the NPA is scheduled to transition to 10-digit dialing or has already transitioned to 10-digit dialing⁵, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.

NANPA shall draft a relief plan petition requesting approval of the overlay and recommending an implementation schedule including network preparation, customer education, and a permissive dialing period.

NANPA shall notify all Affected Parties at least two months in advance of a conference call scheduled to review and approve the draft petition. In the notification, NANPA will include data (e.g., an NPA with a high concentration of assigned NXXs in one or only a few rate centers) supporting the recommendation that the overlay is the only relief method in compliance with the criteria listed in Section 5.0. The two month timeframe notification may be necessary to allow individual industry members to fully analyze impacts to their respective subscribers and networks

⁵ For example, FCC 20-100, ¶53.

in determining the timeframes needed for implementation. Industry members may also need this time to investigate any technical and operations impacts, such as required switch replacements and support system modifications to take into consideration when determining the implementation schedule.

During the conference call, the timeframes for the implementation schedule will be determined to finalize the relief petition. The draft petition will include a recommendation for 10-digit dialing for local⁶ and toll to home NPA (HNPA) and 1+10-digit dialing to local and toll foreign NPA (FNPA), or the state's existing overlay dialing plan. The recommended mandatory dialing date should be six months prior to the forecasted exhaust (see Section 5.1). As usual, meeting minutes shall be produced and distributed by NANPA within 10 days of the conference call.

NANPA shall submit the petition to the appropriate regulatory agency requesting approval of the overlay, and after regulatory approval has been received, NANPA shall proceed with the implementation process, as reflected in Sections 5.7 - 5.12.

- 5.7 Approval by Appropriate Regulatory Authority When the regulator issues an order for NPA relief, NANPA shall confirm the approved plan meets the criteria for assignment as set forth in this document. If the approved plan meets the criteria, NANPA will assign a new NPA within one week of receipt of the approved plan. If the approved plan does not meet the criteria for assignment, NANPA will suspend the assignment pending FCC direction.
- 5.8 Public Statements/Press Releases Public statements released prior to the first industry NPA relief planning meeting should, to the extent available, contain:
 - factual information about the impending exhaust of the NPA
 - and that questions concerning the relief effort may be directed to the NANPA

During the relief planning process, public statements are not encouraged. However, some regulators may require input from the public to the planning process. If questions are directed to the NANPA, or if reaction to a press article is warranted, responses should, to the extent possible, be limited to factual information (as opposed to opinion or preference) concerning relief options being considered and to agreements reached by the industry that are in the public record.

Within two weeks of the NPA assignment NANPA will issue a press release informing the public of this action. NANPA need not issue that press release if the regulatory authority wishes to do so instead. Information that may be incorporated with this notification includes a map indicating NPA boundaries and dialing procedures.

5.9 Industry NPA Relief Implementation Meeting – NANPA will host and facilitate an Industry NPA Relief Implementation meeting via conference call following the final acceptance of a relief plan. (NANPA, on its own initiative or using input from Service Providers, has the option to convene a

⁶ As an industry Best Practice, service providers are encouraged to also provide permissive 1+ 10 digit local dialing at their discretion.

face-to-face meeting if the chosen plan presents unusual implementation factors.) The meeting shall occur no more than 45 days following the assignment of a new NPA. The agenda for the industry implementation meeting should include relevant dates, milestones, customer education, press releases, provision of test numbers, Planning Letter content and subsequent industry communication regarding implementation issues.

5.10 Planning Letter – NANPA shall post a Planning Letter to its website informing the public and the industry of pending NPA relief no more than three weeks after the initial implementation meeting. If regulatory approval of the implementation plan with interval dates is required, the Planning Letter will be published within 10 business days of regulatory approval. If an additional implementation meeting is required, the Planning Letter will be published within 3 weeks of the additional implementation meeting.

This Planning Letter should include a full disclosure of the associated testing period, permissive dialing period, affected NXXs, rate centers, records conversion dates and the beginning date for mandatory dialing of the new NPA (See time line Appendix C). Also included should be a test number for routing verification, the date it will become available and the disconnect date. Other information that may be incorporated with this notification includes a map indicating NPA boundaries, dialing procedures and a NANPA contact name and telephone number. Service providers that are code and/or block holders within the affected NPA should provide to the NANPA their company's NPA Relief Project Coordinator's contact information for inclusion in the company contact section of the Planning Letter.

LERG[™] Routing Guide Notice - The NXXs impacted by NPA relief should be published in the iconectiv[®] LERG Routing Guide at least six months in advance.

Change Notice - NANPA shall post a planning letter with as much detail as possible to notify the public and the industry of any changes to a relief order previously issued by a regulatory authority addressing NPA Relief Planning. NANPA will post a planning letter with as much detail as possible within ten (10) business days of the final written order. If the regulatory authority suspends or rescinds implementation of a planned NPA, the NANPA will include in the Planning Letter a notice that rescinds the implementation information associated with the previously approved NPA relief plan because this information may change when the regulatory authority lifts the suspension. If the subsequent regulatory order requires NANPA to meet with the Industry to obtain details to be included in the Planning Letter, then only the notice of the industry meeting must be distributed within ten (10) business days of the regulatory order and the Planning Letter posted to the NANPA website according to the above paragraphs in this section.

NANPA will update the "Relief Status" of the NPA relief project on the NPA Relief Activity Status Report on the NANPA website from Active to Suspended, Rescinded, etc. based on the terminology used in the regulatory authority order. A brief synopsis from the Planning Letter will be included in the notes section of the NPA Relief Activity Status Report concerning the revised "Relief Status" of the NPA relief project.

Appendix B

Issues To Be Considered During NPA Relief Planning

Following are a list of issues to be considered in weighing the advantages of the relief alternatives.

Subscribers

- quantity of subscribers who will have to undergo number changes
- impact on customer premise equipment (CPE), e.g., reprogramming of wireless devices, automatic dialers, alarm systems, PBXs, etc.
- public reaction to and political involvement in boundary decisions
- · impact on market identity/recognition, geographic identity, public familiarity
- public costs such as reprinting of stationery, business cards, advertising, and CPE and other database reprogramming.

Network and Service Providers

- hardware and software upgrades to switching systems
- modification to or replacement of some operations support systems
- modification to operator services switches and/or systems
- · directory assistance impacts
- 911 system impacts
- · directory changes
- public notification/education requirements
- changes to existing network routing and translations
- · impact of permissive dialing period
- · length of planning period
- impact on dialing plan
- experience with relief method/implementation procedure
- · interaction with appropriate regulatory bodies
- tariff impacts
- internal networks
- LNP compliance impacts

Industry Concerns

- length of relief period
- NPA code utilization
- Number Pooling impact on length of relief period (where applicable)

Relief Planning Meeting Aid

Here is a compilation of industry-developed Pros and Cons to assist the participants in evaluating the attributes of the relief alternatives being considered.

Overlay Pros and Cons:

Overlay Pros:

1 All existing customers would retain the 480 area code
and would not have to change their telephone numbers.
2 Does not discriminate against customers on different sides of a boundary line as does a geographic split.
3 Easier education process.
4 Less customer confusion and easier education process.
5 Less financial impact to business customers because there is no need to change signage, advertising and stationery.
6 Less financial impact on business customers because there is no need to change signage, advertising and stationery unless they currently only show 7-digit numbers.
7 Residential customers do not have to update personal printed material such as checks and websites, etc. unless they currently show 7-digit numbers.
8 Customers do not have to update personal printed material such as checks and websites, etc.
9 Provides the most efficient distribution of numbering resources by allowing assignments to follow demand not withstanding forecasts for growth.
10 No need for synchronization of old and new NPAs in NPAC databases.
11 Minimizes call routing issues, especially with ported numbers.
12 Easier for service providers to implement from a translations billing and service order system perspective.
13 Minimal data entries handled in national databases such as BIRRDS TM , LERG TM and the Terminating Point Master Table.
14 The PSC/PUC would not have to decide which side gets the new NPA, so no winners and losers.
15 Does not split cities or counties into different area codes.
16 Keeps communities of interest intact.
17 No impact on some wireless carriers that have to reprogram handsets manually.
18 No technical impacts to number portability, text messaging or multimedia messaging.

19 An all services overlay is simpler to implement from both a technical and customer education perspective and prevents having to educate customers twice.
20 An all services overlay would have a consistent local dialing pattern, as opposed to a concentrated overlay that could have two different types of local dialing in the 480 NPA.
21 Helps move customers toward universal 10-digit dialing, recognizing the inevitable move of technology towards an internet protocol network, which requires 10-digit dialing.

Overlay Cons:

1 Consistent with FCC regulations, the relief plan would require 10-digit dialing for all local calls within and between the 480 NPA and the new NPA.
2 Financial costs to add NPA to signage and printed material where only 7-digit number is shown.
3 Customers need to reprogram phone systems for 10-digit dialing: faxes, alarms, etc.
4 Customers would have to reprogram any auto-dialing equipment currently programmed to dial 7-digits to dial 10-digits; equipment such as alarm systems, PSAP dial systems, security gates, PBXs, life safety systems, computer modems, voicemail systems, fax machines, etc.
5 Loss of geographic identity with an overlay.
6 Confusion between local and toll calling – 10-d Vs 1+10-d in some states.

NPA Split Pros and Cons NPA Split Pros:

Alternative #	
	1 Customers retain seven-digit dialing for all calls within the same NPA.
	2 Maintains seven-digit dialing for local calls within the same NPA.
	3 Approximately ½ of customers would experience no change if they keep the 480 NPA.
	4 Projected lives are balanced.
	5 The projected lives are slightly more balanced than alternative #
	6 The projected lives are more balanced.

7 This alternative allows to maintain operations on one side of the split line.
8 operating territory is kept intact.
9 Retains the geographic identity with one area code.
10 Keeps the cities on both sides of the split lines intact.

NPA Split Cons:

Alternative #	
	1 Splitsoperating territory between tw NPAs.
	EAS calling is heavily disrupted.
	3 Projected lives are imbalanced, _ years difference, lead balanced of the split alternatives, could become mo imbalanced if demand changes in future years.
	4 Requires approximately ½ of NPA customers to change their area code, thus creating winners and losers.
	5 Requires NPA change for approximately ½ of NP customers.
	6 Requires half of the businesses to incur costs to change the advertising for telephone #'s and stationery.
	7 Financial impact to half of businesses to incur costs to chang their advertising for telephone #'s and stationery if current show 10-digit telephone numbers or are close to the split line.
	8 Creates widespread customer 10-digit dialing confusion acro- the new NPA boundary.
	9 All NPA customers previously went through a split _ yea ago and half will have to change again.
	10 Difficult PSC/PUC decision on which side retains the o NPA.
	11 Longer time period needed for service providers to impleme this type of relief.
	12 Customers whose numbers change must contact friends, fami and business associates with the telephone changes.
	13 More complicated and costly to implement for service providers in their billing, translations and database systems.
	14 Splits affect alarm systems and E-911 databases.
	15 Negative impacts to E911, industry and alarm syste databases that must be updated with customers' new telephor numbers.
	16 Negative impact to directories and directory assistant databases that must be updated with customers' new telephor numbers.

17 Timing of publication of telephone directories must be coordinated with the implementation of the new NPA.
18 Split has a larger impact to greater number of existing customers due to change in existing customers' telephone numbers.
19 Split requires significant challenges to service provider's operational support systems and network elements.
20 Splits cause customer confusion with caller ID during implementation.
21 Older wireless handsets without over-the-air programming must be manually programmed for those numbers that are changing.
22 Splits require the old and new NPAs to be synchronized with the NPAC database to ensure accurate call routing and facilitation of port requests.
23 Splits require a more challenging customer education process for service providers that have customers on both sides of the split line.
24 This split disrupts the SP's host-remote switch arrangement.
25 Splits require the 800/SMS database to be updated.
26 Splits reduce the geographic area served by one area code.
27 Splits the city(s), counties or legislative districts into different area codes.
28 Splits communities of interest.
29 For some wireless carriers, text messaging and multimedia service can only handle one version of the 10-digit number so they will fail if they are sent using the old area code during permissive dialing.



Relief Planning Meeting Aid. Dialing Plans and Implementation Intervals

This meeting aid has examples of industry developed dialing plans and implementation schedules to assist the participants in their decision of the relief alternatives being considered.

OVERLAY DIALING PLAN MEETING AND IMPLEMENTATION SCHEDULE

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) or Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

^{*1+10} digit permissible at each service provider's discretion

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive 10-Digit Dialing and Customer Education Period (Calls within existing NPA can be dialed using 7 or 10 digits) Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
First Code Activation after end of Permissive dialing period (Effective date for codes from the new NPA)	1 month (after Mandatory Dialing Period)
Total Implementation Interval	13 months

^{*} CO codes in the new NPA will not be assigned until all available codes in the original NPA have been exhausted.

SINGLE NPA TRANSITIONED TO 10DD OVERLAY IMPLEMENTATION SCHEDULE

EVENT	TIMEFRAME
Customer Education and Network Preparation Period Begins	Implementation Start Date selected by the Industry
Customer Education and Network Preparation Period Ends	months after the Implementation Start Date selected by the Industry
Effective date of the new NPA (and earliest possible CO code activation)*	months after the Implementation Start Date selected by the Industry

^{*} CO codes in the new NPA will not be assigned until all available codes in the original NPA have been exhausted.



Relief Planning Meeting Aid Dialing Plans and Implementation Intervals

EVENT	TIMEFRAME	
Customer Education and Network Preparation Period	8 Months	
Earliest Activation of CO Codes in the new NPA	1 Month after the completion of customer education and network preparation period	

^{*} CO codes in the new NPA will not be assigned until all available codes in the original NPA have been exhausted.

GEOGRAPHIC SPLIT DIALING PLAN AND IMPLEMENTATION SCHEDULE

Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA)	7 digits (NXX-XXXX)
	Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)
Toll call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

EVENT	TIMEFRAME
Network Preparation Period	6 months
Permissive dialing to the old or new NPA and Customer Education Period (Calls within the home NPA can be dialed using 7 or 10 digits. Calls using the old or new NPA to those changing to the new NPA are acceptable) Mandatory dialing period begins at the end of the Permissive Dialing Period	6 months
Recorded Announcement Period	3 months
First Code Activation (Effective date for codes from the new NPA)	End of Recording Period
Total Implementation Interval	15 months

Relief Planning Meeting Aid Customer Education and Technical Milestones

This meeting aid is a compilation of industry developed customer education and technical milestones. This list is prepared to assist the participants in choosing the milestones that will be applicable to the specific NPA relief planning project.

Customer Milestones:

		Responsibility
1	Issue first customer notification (e.g., bill messages, bill inserts, direct mail, text messaging, email)	
2	Issue initial press release	
3	Send Special letters to PSAPs and Directory Publishers	
4	Update social media with information regarding additional overlay	
5	Update websites with information regarding additional overlay	
6	Develop language for use in Directories to alert the consumers of 10-digit dialing and the new area code.	
	After Permissive 7 and 10-Digit Dialing Begins	
7	Issue second customer notification(e.g., bill messages, bill inserts, direct mail, text messaging, email)	
8	Send Special letters to Alarm and Safety, Directory, Pay Telephone & PSAPs.	
9	Update social media with information regarding additional overlay	
10	Update websites with information regarding additional overlay	
11	Issue second (Mandatory) press release	

Relief Planning Meeting Aid Customer Education and Technical Milestones

Technical Milestones:

		Responsibility
1	Obtain industry test code from NANPA and activate the test number.	·
2	Open the test code in carriers' network.	
3	LERG updates in BIRRDS or via AOCN. (i.e. routing changes, rehomes, change from 7 to 10 terminating digits at end office and at access tandem, etc.	
4	Ensure Highway boxes are programmed with 10-digit dialing.	
5	Network ready for Permissive Dialing	
6	Create Permissive Dialing Industry Contact List	
	Permissive Dialing Begins	
7	Establish NPA Specific type of Trunks	
8	Completion of 10-digit signaling transition between carriers' networks	
9	Require email from service providers when the 10-digit signaling transition between carriers' networks has been completed.	
10	Update on all speed calling, call forwarding numbers and voicemail options in embedded database to reflect 10-digit dialing	
11	Recorded announcements in Place and Tested	
	E911 Work Plan	
12	Confirm new ESN/NPD has been established for the new NPA	
13	Ensure SRDB table has new NPA built in	
14	Notify PSAPs, PSALI customers and County Coordinators (1st and 2nd Notification)	
15	Review and Submit CLEC Trunk Order Requests to local provider if	

Relief Planning Meeting Aid Customer Education and Technical Milestones

needed	
16 Update PSAP equipment	
17 Trunk Orders Complete	
18 Build E911 Network/Tandem	
Translations	
19 Verify if all PSAP work has been	
completed	
20 Activate E911 Network/Tandem	
Translations	

Initial Planning Document

For

Relief of Arizona 480 NPA

April 28, 2021

North American Numbering Plan Administrator

Heidi A. Wayman Manager, Data Management

480 NPA Background Information

Relief Planning Background and Assumptions:

The 480 NPA was introduced in 1999 when it was part of a double split from the 602 NPA creating both the 480 and 623 NPAs which split the Phoenix rate center between all three NPAs.

The 480 has only one rate center: Phoenix. It serves counties of Maricopa and Pinal. The 480 serves cities including but not limited to Chandler, Gilbert, Mesa, Phoenix, the state capital; Tempe, Scottsdale and Sun Lakes. The 480 is bordered on the north by the 623 and 928 NPAs, to the east by the 520 and 928 NPAs, to the south by the 520 NPA and to the west the by the 602, 623 and 928 NPAs.

CO Code Summary:

As of March 27, 2021, the 480 NPA has 717 codes assigned, 64 codes available for assignment and 22 Un-Assignable codes. There are 40 service provider OCNs that are code holders in the 480 NPA and two OCNs that are only thousand-block holders in the NPA.

As of March 27, 2021, the 602 NPA has 701 codes assigned, 76 codes available for assignment and 23 Un-Assignable codes. There are 39 service provider OCNs that are code holders in the 602 NPA. As of the same date, the 623 NPA has 276 codes assigned, 501 codes available for assignment and 23 Un-Assignable codes. There are 40 service provider OCNs that are code holders and five (5) OCNs that are only thousand-block holders in the NPA.

Exhaust Forecast:

The October 2020 NRUF (Numbering Resource Utilization/Forecast) and NPA Exhaust Analysis ("2020 NRUF Report"), published by NANPA, indicates that the 480 NPA will exhaust during the first quarter of 2024. Relief planning for an additional overlay NPA is to start in the first quarter of 2021.

NPA RELIEF PLANNING TOOL ASSUMPTIONS FOR 480 NPA

PROJECTED EXHAUST DATE......1Q2024

ANNUALIZED CODE DEMAND PROJECTION......20

MONTHLY CO CODE DEMAND PROJECTION......1.7

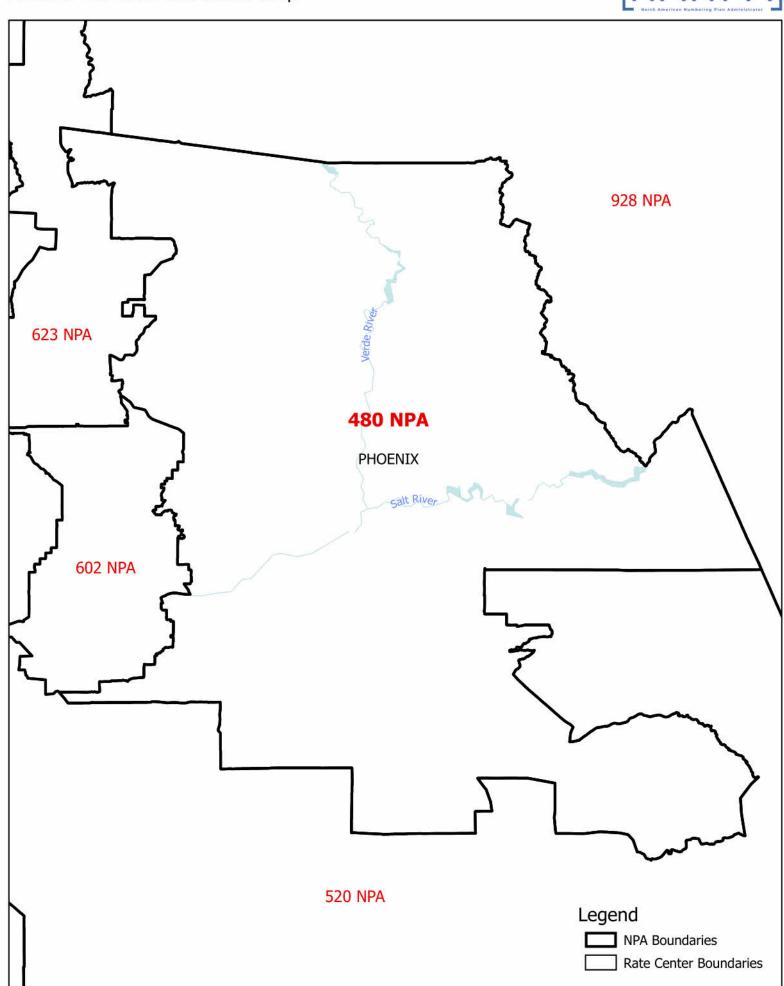
NXX Assignment DataFebruary 2021

CURRENT DIALING PLAN

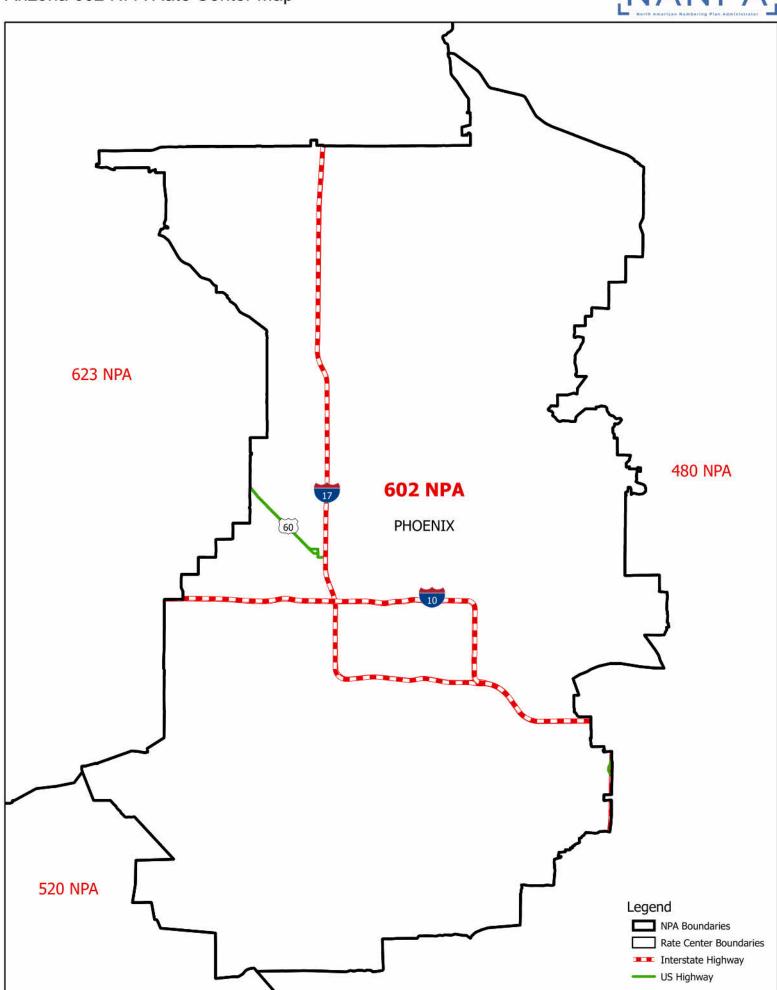
Type of Call	Call Terminating in	Dialing Plan
Local call	Home NPA (HNPA)	7 digits (NXX-XXXX)
39-1400-1200-100-100-100-100-100-100-100-100-	Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)
Toll Call	Home NPA (HNPA)	1+10 digits (1+ NPA-NXX-XXXX)
	Foreign NPA (FNPA)	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)



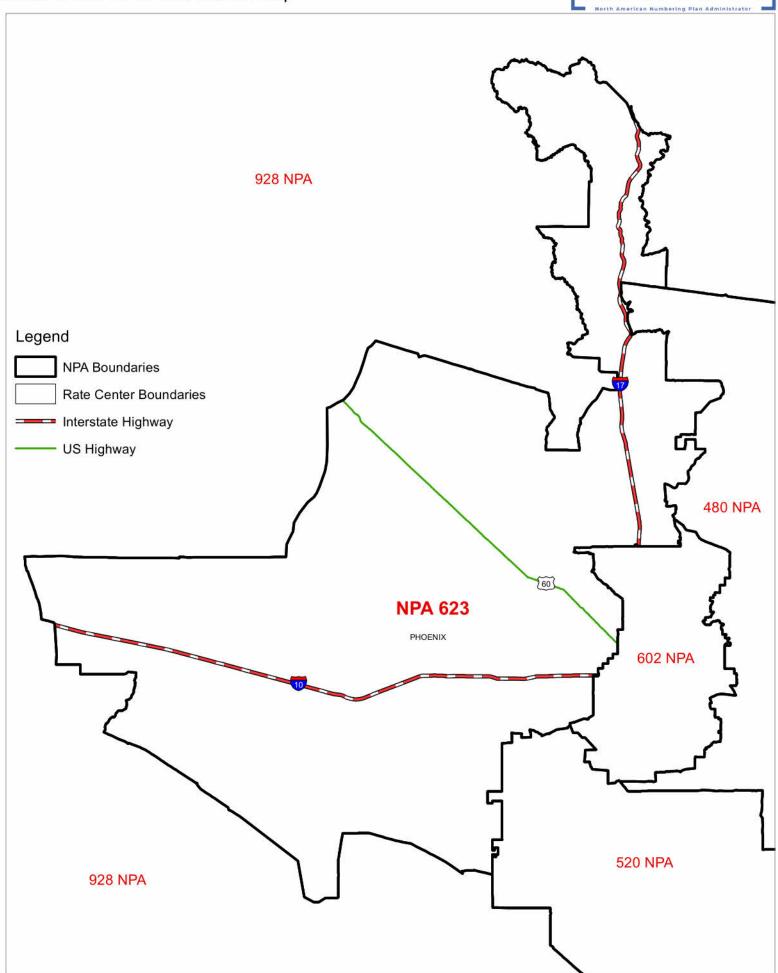












Arizona NXX Summary Data as of 3/27/2021

NDA	480	602	622			
NPA		<u>602</u>	<u>623</u>			
Assigned NXXs	717	701	276			
Protected NXXs	0	0	0			
Reserved NXXs	0	0	0			
Unavailable NXXs	22	23	23			
Available NXXs	61	76	501			
Total	800	800	800			
Code Assignment History						
2016	17	12	8			
2017	16	6	5			
2018	19	10	6			
2019	21	13	7			
2020	27	18	17			
2021	6*	6*	2*			
*As of March 27, 2021						
Note: Unavailable indicates code	s that are i	unavailabl	e for assigi	ıment. Th	iese	
codes include, but are not limited					59,	
555, time), N11 and other unique	codes (e.g.	., 976, 950)	and codes	3		
with special dialing arrangements						
NPA boundary).						
			_			

POOLING STATISTICS Provided By: Cecilia McCabe			
ST/NPA:	AZ 480	AZ 602	AZ 623
MEETING DATE:	4/28/21	4/28/21	4/28/21
POOL START DATE (PSD)	3/14/02	2/14/02	12/18/02
RATE CENTERS			
# Total	1	1	1
# Mandatory	1	1	1
# Mandatory-Single Service Providers (M*)	0	0	0
# Optional	0	0	0
# Excluded	0	0	0
BLOCKS ASSIGNED	-		
# Total	250	174	124
(For time period 4/01/20 - 3/17/21)			
BLOCKS AVAILABLE			
#Total	24	13	3
(As of preparation date: 3/17/21)			
CODES ASSIGNED	25	10	12
# Total	25	18	13
# for Pool Replenishment	22	18	12
# for Dedicated Customers	3	0	0
# for LRNs	3	U	1
(For time period 4/01/20 - 3/17/21)	-		
CODES FORECASTED			
# Total	5	5	11
# for Pool Replenishment and Dedicated Customers	5	5	11
# for LRNs	0	0	0
(For the next twelve months as of: 3/17/21)			

480 NPA Code Holder List

NPA Complex	OCN	Company
480	018J	AIRUS, INC AZ
480	073H	TELNYX LLC
480	114J	EXIANT COMMUNICATIONS LLC
480	2226	MIDVALE TELEPHONE EXCHANGE, INC.
480	2524	GREAT WEST SERVICES, LTD ARIZONA
480	3285	LEVEL 3 COMMUNICATIONS, LLC - AZ
480	347G	MCC TELEPHONY OF THE WEST, LLC - AZ
480	425J	CSC WIRELESS, LLC
480	4360	GLOBAL CROSSING LOCAL SERVICES, INCAZ
480	478J	BRIGHTLINK COMMUNICATIONS, LLC
480	4793	XO ARIZONA, INC.
480	506J	TWILIO INTERNATIONAL, INC.
480	508J	CENTURYLINK COMMUNICATIONS, LLC
480	5562	METRO PCS, INC.
480	579F	PEERLESS NETWORK OF ARIZONA, LLC - AZ
480	587F	BANDWIDTH.COM CLEC, LLC - AZ
480	597F	VOIP INNOVATIONS, LLC
180	6010	NEW CINGULAR WIRELESS PCS, LLC
480	624H	ONVOY SPECTRUM, LLC
480	630E	ONVOY, LLC - AZ
480	6529	T-MOBILE USA, INC.
480	6572	CELLCO PARTNERSHIP DBA VERIZON WIRELESS - AZ
480	657E	COMCAST PHONE OF ARIZONA, LLC - AZ
480	6630	USA MOBILITY WIRELESS, INC.
180	6664	SPRINT SPECTRUM L.P.
480	6906	AMERICAN MESSAGING SERVICES, LLC
180	7078	COX ARIZONA TELCOM, INC AZ
180	7175	ELECTRIC LIGHTWAVE LLC DBA ALLSTREAM
480	7184	MCLEODUSA TELECOMMUNICATIONS SERVICES, INC AZ
180	7217	TELEPORT COMMUNICATIONS AMERICA, LLC - AZ
180	7229	MCIMETRO ACCESS TRANSMISSION SERVICES LLC
480	722E	YMAX COMMUNICATIONS CORP AZ
480	7421	AT&T LOCAL
480	7552	LEVEL 3 TELECOM OF ARIZONA, LLC - AZ
180	7991	SADDLEBACK COMMUNICATIONS COMPANY
180	815H	RCLEC, INC AZ
480	939H	COMMIO, LLC
480	947E	GILA LOCAL EXCHANGE CARRIER, INC AZ
480	9636	QWEST CORPORATION
480	965H	FRACTEL, LLC

Thousand-Block Holders not Assigned CO Codes

NPA Complex	OCN	Company	
480	232C	CITYNET ARIZONA, LLC - AZ	
480	663G	RE-INVENT TELECOM, LLC - AZ	

602 NPA Code Holder List

NPA Complex	OCN	Company
602	073H	TELNYX LLC
602	181J	ADVANCED TELECOM SOLUTIONS LLC
602	197D	VONAGE NETWORK INC.
602	232C	CITYNET ARIZONA LLC - AZ
602	321J	HD CARRIER LLC
602	3285	LEVEL 3 COMMUNICATIONS LLC - AZ
602	410H	WIDE VOICE LLC - AZ
602	4360	GLOBAL CROSSING LOCAL SERVICES INCAZ
602	4793	XO ARIZONA INC.
602	508J	CENTURYLINK COMMUNICATIONS LLC
602	5562	METRO PCS INC.
602	579F	PEERLESS NETWORK OF ARIZONA LLC - AZ
602	587F	BANDWIDTH.COM CLEC LLC - AZ
602	6010	NEW CINGULAR WIRELESS PCS LLC
602	624H	ONVOY SPECTRUM LLC
602	630E	ONVOYLLC - AZ
602	6529	T-MOBILE USA INC.
602	6572	CELLCO PARTNERSHIP DBA VERIZON WIRELESS - AZ
602	657E	COMCAST PHONE OF ARIZONA LLC - AZ
602	6630	USA MOBILITY WIRELESS INC.
602	663G	RE-INVENT TELECOM LLC - AZ
602	6664	SPRINT SPECTRUM L.P.
602	6906	AMERICAN MESSAGING SERVICES LLC
602	6908	TOUCH TONE INTERACTIVE INC.
602	7078	COX ARIZONA TELCOM INC AZ
602	7175	ELECTRIC LIGHTWAVE LLC DBA ALLSTREAM
602	7184	MCLEODUSA TELECOMMUNICATIONS SERVICES INC AZ
602	7217	TELEPORT COMMUNICATIONS AMERICA LLC - AZ
602	7229	MCIMETRO ACCESS TRANSMISSION SERVICES LLC
602	722E	YMAX COMMUNICATIONS CORP AZ
602	7389	GEOTEK COMMUNICATIONS INC.
602	7421	AT&T LOCAL
602	7552	LEVEL 3 TELECOM OF ARIZONA LLC - AZ
602	8293	NORTH COUNTY COMMUNICATIONS CORP.
602	890G	INTRADO COMMUNICATIONS LLC
602	947E	GILA LOCAL EXCHANGE CARRIER INC AZ
602	9636	QWEST CORPORATION
602	965H	FRACTEL LLC
602	996H	AIRESPRING INC.

623 NPA Code Holder List

NPA Complex	OCN	Company
623	3285	LEVEL 3 COMMUNICATIONS LLC - AZ
623	4360	GLOBAL CROSSING LOCAL SERVICES INCAZ
623	4793	XO ARIZONA INC.
623	508J	CENTURYLINK COMMUNICATIONS LLC
623	516J	TON80 COMMUNICATIONS LLC
623	5562	METRO PCS INC.
623	566J	RADIANTIQLLC
623	579F	PEERLESS NETWORK OF ARIZONA LLC - AZ
623	587F	BANDWIDTH.COM CLEC LLC - AZ
623	6010	NEW CINGULAR WIRELESS PCS LLC
623	624H	ONVOY SPECTRUM LLC
623	630E	ONVOY LLC - AZ
623	6529	T-MOBILE USA INC.
623	6572	CELLCO PARTNERSHIP DBA VERIZON WIRELESS - AZ
623	657E	COMCAST PHONE OF ARIZONA LLC - AZ
623	6664	SPRINT SPECTRUM L.P.
623	6906	AMERICAN MESSAGING SERVICES LLC
623	7078	COX ARIZONA TELCOM INC AZ
623	7175	ELECTRIC LIGHTWAVE LLC DBA ALLSTREAM
623	7184	MCLEODUSA TELECOMMUNICATIONS SERVICES INC AZ
623	7217	TELEPORT COMMUNICATIONS AMERICA LLC - AZ
623	7229	MCIMETRO ACCESS TRANSMISSION SERVICES LLC
623	7421	AT&T LOCAL
623	7552	LEVEL 3 TELECOM OF ARIZONA LLC - AZ
623	947E	GILA LOCAL EXCHANGE CARRIER INC AZ
623	9636	QWEST CORPORATION
623	965H	FRACTEL LLC

Thousand-Block Holders not Assigned CO Codes

NPA Complex	OCN	Company	
623	073H	TELNYX LLC	
623	2191	ACCIPITER COMMUNICATIONS INC	
623	232C	CITYNET ARIZONA LLC - AZ	
623	663G	RE-INVENT TELECOM LLC - AZ	
623	722E	YMAX COMMUNICATIONS CORP AZ	

RATE CENTER TABLE

NPA	Abbreviated Rate Center	
480	PHOENIX	
NPA	Abbreviated Rate Center	
602	PHOENIX	
NPA	Abbreviated Rate Center	
623	PHOENIX	

480 NPA - RELIEF ALTERNATIVES

ARIZONA

Numbering Plan Area Born on Date: March 1, 1999

NPA RELIEF PLANING TOOL ASSUMPTIONS

NRUF DATE	October 2020
PROJECTED EXHAUST DATE	1Q2024
ANNUALIZED CODE DEMAND PROJECTION	20
MONTHLY CO CODE DEMAND PROJECTION	1.7
NXX Assignment data	February 1, 2021

CURRENT DIALING PLAN

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA)	7 digits (NXX-XXX)
	Foreign NPA (FNPA)	10 digits (NPA-NXX-XXXX)
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

TRANSITION to 10-DIGIT DIALING for 988 as 3-DIGIT ACCESS to NATIONAL SUICIDE PREVENTION LIFELINE

Per NANPA Planning Letter PL-556, on July 16, 2020, the FCC adopted an Order (FCC 20-100) approving the designation of 988 as the 3-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline, requiring all telecommunications carriers, interconnected Voice over Internet Protocol (VoIP) providers, and one-way VoIP providers (covered providers) to make any network changes necessary to ensure that users can dial 988 to reach the existing National Suicide Prevention Lifeline: 1-800-273-8255 / 1-800-273 (TALK) by July 16, 2022.1 The Order requires covered providers to implement mandatory 10-digit dialing in NPAs that use both 7-digit dialing and 988 as an NXX. The 480 NPA is included in the requirements of this FCC order.

ACTION	TIME	DATE
Start of Network Preparation and Customer Education		July 16, 2020 (This starts the 9.5-month period prior to permissive dialing effective date for carriers to implement permissive 10-digit dialing in their networks and start educating customers about the upcoming dates.)

Start of permissive 10-digit dialing ("permissive 10-digit dialing effective date")	12:01 am local time	April 24, 2021 (This is the date communicated to customers as the "permissive dialing date" and starts the 6-month period where customers start practicing dialing 10 digits and reprogram CPE as needed; this is typically a 6-month period in an overlay implementation.)
End of permissive dialing and start of mandatory 10-digit dialing ("mandatory 10-digit dialing effective date")	12:01 am local time	October 24, 2021 (This is the date communicated to customers as the "mandatory dialing date" and starts the 8.5-month period where carriers can start enforcing mandatory 10-digit dialing through their carrier-specific rolling cut schedule. This is not a flash cut.)
End of mandatory 10-digit enforcement implementation	12:01 am local time	July 15, 2022 (This is the deadline by which carriers must have completed their rolling cuts to enforce mandatory 10-digit dialing.)
Covered providers shall transmit all calls initiated by an end user dialing 988 to the current toll-free access number for the National Suicide Prevention Lifeline, presently 1-800- 273-8255 (TALK)	12:01 am local time	July 16, 2022

During the permissive dialing period, subscribers may dial local calls on either a 7-digit or 10-digit basis but will be encouraged to dial 10 digits. After the permissive dialing period ends, all calls should be dialed using 10 digits. Carriers are strongly encouraged to prepare their switches to begin signaling 10 digits prior to the mandatory 10-digit dialing effective date for customers.

Coincident with the mandatory 10-digit dialing effective date on October 24, 2021, the dialing plan will be as follows, unless the state/NPA has a different dialing plan.

OVERLAY DIALING PLAN

Type of Call	Call Terminating in	Dialing Plan
Local Call	Home NPA (HNPA) Foreign NPA (FNPA) (including Extended Area Service (EAS) calls)	10 digits (NPA-NXX-XXXX)*
Toll Call	HNPA or FNPA	1+10 digits (1+NPA-NXX-XXXX)
Operator Services Credit card, collect, third party	HNPA or FNPA	0+10 digits (0+NPA-NXX-XXXX)

1+10 digit permissible at each service provider's discretion

NPA RELIEF ALTERNATIVES

OVERLAY ALTERNATIVE

ALTERNATIVE #1 - ALL SERVICES DISTRIBUTED OVERLAY

A new NPA code would be assigned to the same geographic area occupied by the existing 480 NPA. Customers would retain their current telephone numbers; however, ten-digit local dialing by all customers within and between NPAs in the affected area would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 480 NPA all future code assignments will be made in the overlay area code. The projected life would be:

Total CO Codes = 737 Total Rate Centers = 1 Area Code Life in Years = 35 years

ALTERNATIVE #2 - NPA BOUNDARY ELIMINATION OVERLAY

The boundary between the existing 480, 602 and 623 NPA codes would be eliminated and the 480, 602 and 623 NPAs would be assigned to the same geographic areas occupied by the existing 480, 602 and 623 NPAs. The 480, 602 and 623 NPA customers would retain their current telephone numbers; however, ten-digit dialing for all calls by all customers within and between the 480, 602 and 623 NPAs affected area would be required. Available central office codes in the 602 and 623 NPAs will be assigned upon request in the 480 area with the effective date of the new area code boundary and available 480 NPA central office codes could be assigned upon request in the 602 and 623 NPA area. At exhaust of the 480 NPA, all future NXX code assignments will be made from the 602 and 623 NPAs code supply of central office codes. The 602 NPA has one rate center (PHOENIX) and the projected exhaust is 3Q2027. The 623 NPA has one rate center (PHOENIX) and the projected exhaust is more than 30 years out. Eliminating the boundary between the 480, 602 and the 623 NPAs would have a combined life of 26 years and would save two NPAs.

<u>480 NPA</u>	602 NPA	<u>623 NPA</u>
Total CO Codes = 737	Total CO Codes = 724	Total CO Codes = 299
Total Rate Centers = 1	Total Rate Centers = 1	Total Rate Centers = 1

Combined Area Code Life in Years = 26 years

GEOGRAPHIC SPLIT ALTERNATIVE

Per Section 5.6.2 of the NPA Code Relief Planning & Notification Guidelines (ATIS-0300061) an overlay is the only relief option of the 480 NPA.

Where NPA relief is required for a single NPA area and NANPA has determined that only an overlay alternative will meet the guidelines, or the NPA is scheduled to transition to 10-digitdialing or has already transitioned to 10-digit dialing, then the Initial Planning Document, relief planning meeting, and industry consensus to recommend an overlay is not required.



